

UNITED STATES DISTRICT COURT
for the
DISTRICT OF VERMONT

EDWARD A. MUELLER, M.D.,

Plaintiff,

- vs. -

RUTLAND MENTAL HEALTH SERVICES, INC.,

Defendant.

Docket No.: 1:05-CV-38

BY
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2006 OCT 11 AM 10:36

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

DEFENDANT'S PRELIMINARY PROPOSED JURY VERDICT INTERROGATORIES

Defendant, through its attorneys, submits the following proposed Jury Verdict

Interrogatories to be submitted to the jury for the purpose of rendering its verdict.

1. Did Defendant discriminate against Plaintiff in violation of the Americans with Disabilities Act?

_____ Yes

_____ No

(If your answer to this question is Yes then move to the next answer. If your answer is No then move to question 3).

2. Was the discriminatory conduct of the Defendant a proximate cause of any damages suffered by Plaintiff?

_____ Yes

_____ No

3. Did Defendant discriminate against Plaintiff in violation of Vermont's Fair Employment Practices Act?

_____ Yes

_____ No

(If your answer to question 3 is Yes then move to the next question. If the answer is No then move to question 5).

4. Was the discriminatory conduct of Defendant a proximate cause of damages suffered by Plaintiff?

_____ Yes

_____ No

(If you did not answer Yes to any of the Questions 1 though 4 then sign the form below. If you answered Yes to any of Questions 2 or 4 then move to the next question).

5. What are Plaintiff's damages (assuming you answered Questions 2 and/or 4 "Yes").

Past lost income and benefits \$ _____

Future lost income and benefits \$ _____

Emotional distress \$ _____

TOTAL \$ _____

(Answer the next question only if you awarded damages in Question 7)

6. Is Plaintiff entitled to punitive damages?

_____ Yes

_____ No

(If your answer to this question is Yes then move to the next question. If your answer is No then sign below).

7. What punitive damages do you award Plaintiff?

\$ _____

DATED _____, 2006.

Foreperson